

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
Civil Action No. 1:19-cv-206

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WESLEY CRAWFORD,

Plaintiff,

vs.

BLUE RIDGE METALS  
CORPORATION, DONALD YOUNG,  
individually, KEITH RAMSEY,  
individually, and  
JENNIFER KIRKPATRICK,  
individually,

Defendants.

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)  
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)  
)  
) PLAINTIFF WESLEY CRAWFORD'S  
) MOTION FOR A PROTECTIVE  
) ORDER THAT HIS DEPOSITION BE  
) TAKEN REMOTELY, VIA  
) COMPUTER TECHNOLOGY  
)  
)  
)  
)  
)  
) (Rules 26(c) and 30(a)(4),  
) Fed. R. Civ. P.)

TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiff Wesley Crawford will, and hereby does, move for an order that his deposition in this case be taken remotely, via computer technology. On June 22, 2020, Defendants served a deposition notice that Plaintiff's deposition be taken in-person at the Hilton Asheville Biltmore Park Hotel, on July 9, 2020, and continuing until completed. A copy of the deposition notice is attached hereto as **Exhibit-A**. Plaintiff requests that his deposition be taken remotely via computer technology because of his health condition relative to the current COVID-19 pandemic. The Court previously conducted a telephone hearing on this issue on June 30, 2020. Plaintiff certifies that his counsel has attempted to obtain agreement with defense counsel on this matter, but the parties have not reached agreement.

Plaintiff's motion is based upon this motion, Plaintiff's Memorandum In Support Of His Motion For A Protective Order That His Deposition Be Taken Remotely, Via Computer

Technology; the Affidavit Of Glen C. Shults In Support Of Plaintiff's Motion For A Protective Order That His Deposition Be Taken Remotely, Via Computer Technology, all of which are filed concurrently, applicable statutes, regulations, and case law, any oral argument, and all of the pleadings and files in the case.

Dated: July 3, 2020

LAW OFFICES OF GLEN C. SHULTS

By: Glen C. Shults

Attorneys for Plaintiff  
WESLEY CRAWFORD

959 Merrimon Avenue, Suite 204 (28804)  
P.O. Box 18687  
Asheville, North Carolina 28814  
Telephone: (828) 251-9676  
Facsimile: (828) 251-0648  
E-Mail: shultslaw@bellsouth.net

## **Exhibit-A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CIVIL ACTION NO: 1:19-cv-00206-MOC-WCM**

**WESLEY CRAWFORD,**

**Plaintiff,**

**v.**

**BLUE RIDGE METALS CORPORATION,  
DONALD YOUNG, individually, KEITH  
RAMSEY, individually, JENNIFER  
KIRKPATRICK, individually,**

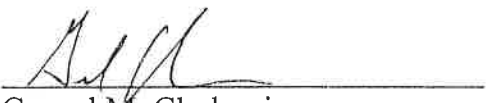
**Defendants.**

**NOTICE OF DEPOSITION OF  
PLAINTIFF WESLEY CRAWFORD**

PLEASE TAKE NOTICE that Defendants Blue Ridge Metals Corporation, Donald Young, Keith Ramsey, and Jennifer Kirkpatrick, by and through their counsel, will take, pursuant to Rule 30 of the Federal Rules of Civil Procedure and for use in accordance with all purposes allowed by law, the deposition of Plaintiff Wesley Crawford beginning at 10:00 a.m., on Thursday, July 9, 2020, and continuing until completed. The deposition will take place at the Hilton Asheville Biltmore Park, Mitchell Room, 43 Town Square Blvd., Asheville, NC 28803. The deposition will be taken under oath and before an officer authorized by law to administer oral examinations, and may also be videotaped.

This the 22nd day of June, 2020.

  
Jonathan W. Yarbrough  
N.C. State Bar No. 21316  
CONSTANGY, BROOKS,  
SMITH & PROPHETE, LLP  
84 Peachtree Road, Suite 230  
Asheville, NC 28803  
Telephone: (828) 277-5137  
Facsimile: (828) 277-5138  
Email: [jyarbrough@constangy.com](mailto:jyarbrough@constangy.com)

  
Gerard M. Clodomir  
N.C. State Bar No. 54176  
CONSTANGY, BROOKS,  
SMITH & PROPHETE, LLP  
100 North Cherry St., Suite 300  
Winston-Salem, NC 27101  
Telephone: (336) 721-1001  
Facsimile: (336) 283-0385  
Email: [gclodomir@constangy.com](mailto:gclodomir@constangy.com)

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this date a copy of the foregoing **NOTICE OF DEPOSITION OF PLAINTIFF WESLEY CRAWFORD** was served on counsel for Plaintiff by depositing a copy of same in the United States Mail, postage prepaid, and addressed as follows:

Glen C. Shults  
Law Offices of Glen Shults  
959 Merrimon Avenue  
Asheville, NC 28814

J. Wiley Westall, III  
Westall, Gray & Connolly, P.A.  
81 Central Avenue  
Asheville, NC 28801

This, the 22nd day of June, 2020.



Gerard M. Clodomir  
N.C. State Bar No. 54176  
CONSTANGY, BROOKS,  
SMITH & PROPHETE, LLP  
100 North Cherry St., Suite 300  
Winston-Salem, NC 27101  
Telephone: (336) 721-1001  
Facsimile: (336) 283-0385  
Email: [gclodomir@constangy.com](mailto:gclodomir@constangy.com)